

*Neuman, S.*

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

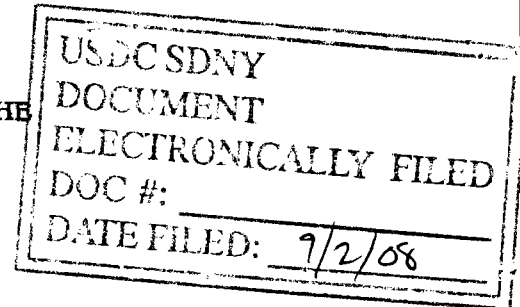
SANDRA LIFSCHITZ, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

HEXION SPECIALTY CHEMICALS, INC.,  
CRAIG O. MORRISON and JOSHUA J. HARRIS,

Defendants.



Civil Action No: 08 Civ. 6394(RMB)

**STIPULATION AND ~~PROPOSED~~ ORDER**

WHEREAS, the complaint in the above-captioned action (the "Action") is governed by the provisions of the Private Securities Litigation Reform Act of 1995 (the "PSLRA");

WHEREAS, the PSLRA provides a procedure for consolidating federal securities class actions, whereby the Court will appoint a lead plaintiff and approve its selection of lead counsel;

WHEREAS, upon being appointed by the Court, the lead plaintiff will file a consolidated amended complaint superseding the present complaint in this Action; and

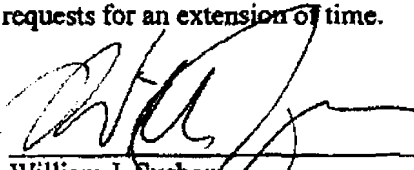
WHEREAS, the parties wish to avoid having Hexion Specialty Chemicals, Inc., Craig O. Morrison and Joshua J. Harris (collectively, the "Defendants") move, answer or otherwise respond until the consolidated amended complaint is filed;

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

1. Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the current complaint in this Action. Defendants shall move, answer or otherwise respond to the Consolidated Amended Complaint within sixty (60) days of service upon Defendants' counsel of the Consolidated Amended Complaint.

2. There have been no previous requests for an extension of time.

Dated: August 25, 2008  
New York, New York



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William J. Sushon  
O'MELVENY & MYERS LLP  
Seven Times Square  
New York, New York 10036  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061  
E-mail: wsushon@omm.com

*Counsel for Defendants Hexion Specialty  
Chemicals, Inc. and Craig O. Morrison*

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Robert I. Bodian  
MINTZ LEVIN COHN FERRIS GLOVSKY &  
POPEO P.C.  
Chrysler Center  
666 Third Avenue  
New York, New York 10017  
Telephone: (212) 935-3000  
Facsimile: (212) 983-3115  
E-mail: rbodian@mintz.com

*Counsel for Defendant Joshua J. Harris*

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

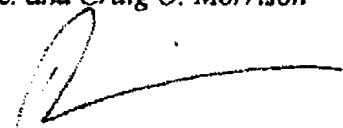
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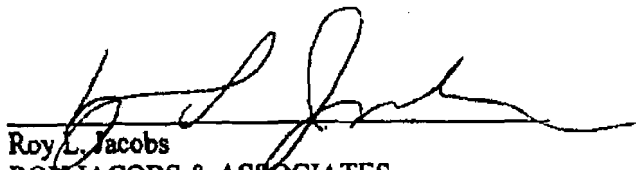
*Counsel for Defendants Hexion Specialty  
Chemicals, Inc. and Craig O. Morrison*



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MINTZ LEVIN COHN FERRIS GLOVSKY &  
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Chrysler Center  
666 Third Avenue  
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Telephone: (212) 935-3000  
Facsimile: (212) 983-3115  
E-mail: rbodian@mintz.com

*Counsel for Defendant Joshua J. Harris*



Roy L. Jacobs  
ROY JACOBS & ASSOCIATES  
60 East 42nd Street, 46th Floor  
New York, New York 10165  
Telephone: (212) 867-1156  
Facsimile: (212) 504-8343  
E-mail: [rjacobs@jacobsclasslaw.com](mailto:rjacobs@jacobsclasslaw.com)

*Counsel for Plaintiff*

SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

9/2/08

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